



April 16, 2012

Leviton Manufacturing, Inc.

201 N. Service Road

Melville, NY, 11747

Case 03-E-0188

Proceeding on the Motion of the Commission Regarding a Retail Renewable Portfolio Standard

Subject: Petition for Expansion of RPS Customer-Sited Tier Photovoltaics Program

Hon. Jaclyn A. Brillong

Secretary to the Commission

New York State Public Service Commission

Agency Building 3

Albany, NY 1223-1350

Dear Secretary Brillong,

Leviton stands in appreciation of the opportunity to comment on the New York State Energy Research and Development Authority (NYSERDA) subject petition.

Leviton is a New York based electrical wiring and solutions company with over 106 years of experience and a long time provider of good jobs in New York State, with our corporate headquarters located in Melville, NY. Recently, Leviton decided to continue its green business initiatives by entering the solar industry, and further has determined that New York is an excellent market for this new business initiative. Since February this year, Leviton has begun to market and sell solar systems with good success in the New York solar market. We are pleased to work with Karen Hamilton, Director, Residential Energy Services of NYSERDA and her staff in implementing our business plans.

Today, I write on behalf of Leviton to stand in support of the petition as provided by NYESERDA. The planned doubling of funding would work to enable the CST program to meet important new targets as set by Governor Cuomo.

Solar energy represents one of the most appropriate renewable solutions for New York and the adaptation thus far has met or exceeded program goals to date and with great success.

Leviton foresees a significant growth business with important contributions in green, renewable and clean energy sources which contribute to the economic stability of the state and nation, provide important new employment opportunities, and work to provide energy pricing stability as well as better and more predictable grid performance and demand characteristics.

Funding by NYESERDA and the NYSPSC are essential at this point of the renewables industry growth cycle in New York. This model of sufficient rebate support to a new and developing industry followed by reduced incentives in subsequent years has been demonstrated in important renewables regions throughout the world including Japan, Germany, and in California.

The split between the competitive bidding program and the standard-offer program at 75%/25% is a reasonable starting point, and emphasis should be maintained on the residential and small commercial sector (standard-offer program) which naturally reduces overall grid demand by removing load from the grid, and ultimately provides a robust citizen driven demand for renewable energy with the potential to satisfy a significant renewables demand based on the power of the individual purchaser.

In addition, Leviton is in strong support of the third party ownership model, one that we have adopted and one that provides the most compelling and robust economic system of delivery of renewable energy to the consumer on the same basis as other utilities provide their services – on a monthly billing cycle. Third party ownership provides guaranteed performance which does not require state resources to manage, and a more sophisticated delivery and quality control process. Leviton believes this model is compelling and dominant, and should be allowed and promoted throughout New York. Some utilities, such as LIPA, do not allow rebate eligibility to this model, which inhibits the ability of many consumers to access PV when they otherwise are capable of making monthly utility payments. Simply stated, the third party ownership model levels the playing field for all consumers whether or not they have the ability to purchase a system outright.

In addition, Leviton does not support limited participation by any solar provided or so called “Entity Caps”. Natural competition and offer differentiation should be the mechanism by which the market naturally drives to lower cost and more compelling solutions. Companies that provide the best services and most cost effective solutions will eventually dominate the market sector, and for good reason. Providing entity caps to protect certain classes of participants is counterproductive to what ultimately the goal of the effort is – to develop a sustainable and cost effective renewable energy industry that increasingly contributes to the overall energy supply, benefiting New York State and its residents.


Leviton would also urge that the NY Sun proposal be modified to provide the same income tax credit of \$5,000 or 25% of the system costs to both individual owners and third party owners so that both models

are able to compete on a level playing field. Incenting one model over the other, in light of the impressive growth and demonstrated benefit of third party ownership in areas where the tax incentives are equivalent does seem consistent with the a market based evolution of renewables capabilities in New York.

Finally, Leviton would like to suggest that NYSERDA and LIPA could be directed to work together in order to identify best practices in order to streamline permitting requirements for PV installation in New York. These requirements vary significantly from region to region and contribute to additional costs and uncertainties in the residential and small commercial markets. This type of effort is arguably exactly the type that can be best confronted by NYSERDA and LIPA.

In conclusion, Leviton stands in strong support of the subject Petition by NYSERDA to the New York State Public Service Commission. I would be available to discuss any questions or issues you may wish to pursue.

With gratitude and best regards,

A handwritten signature in blue ink, appearing to read "William C. Poulin". The signature is written in a cursive style and is positioned above the printed name.

William C. Poulin

Sr. Director of Renewable

Leviton Manufacturing, Inc.